

BEFORE THE  
POSTAL REGULATORY COMMISSION  
WASHINGTON, D.C. 20268-0001

MODIFICATION OF SERVICE PERFORMANCE  
MEASUREMENT PLAN

Docket No. PI2022-3

**COMMENTS OF THE NATIONAL POSTAL POLICY COUNCIL**  
(May 17, 2022)

The National Postal Policy Council respectfully submits these comments on the Commission's Notice and Order in this proceeding.<sup>1</sup>

The Postal Service proposes to modify its service performance measurement plan in three ways.<sup>2</sup> Two of those affect First-Class Mail, which is of primary interest to NPPA members. NPPC supports both changes.

One revision would address the long-haul exception to "Start-the-Clock" events, thereby enabling more plant-loaded First-Class Presort mail to be included in the service measurements. Including currently-omitted mail in service performance measurements should improve the accuracy of reported service performance.

The Postal Service also proposes to include Reply Mail in the measurement of Single-Piece First-Class Letters/Cards/Flats. NPPC has

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<sup>1</sup> *Notice and Order Initiating Proceeding To Consider Modifications To Market Dominant Service Performance Measurement Systems*, Order No. 6159 (April 22, 2022).

<sup>2</sup> *United States Postal Service Notice of Filing Changes To Service Performance Measurement Plan Document*, at 1 (April 22, 2022). NPPC takes no position on the Postal Service's third proposal, which addresses critical entry times for Periodicals.

stressed in several recent proceedings<sup>3</sup> the enormous importance of remittance mail to both individuals and businesses and has encouraged the Postal Service to take steps to measure and report remittance mail service separately from all First-Class Single Piece mail. NPPC commends the Postal Service for recognizing the desirability of measuring Reply Mail service performance and supports this change as a step towards improving the transparency of the service provided to remittance mail. NPPC urges the Postal Service not merely to track Reply Mail, but to report its performance (and eventually that of remittance mail) separately from the other Single Piece letters, cards, and flats.

NPPC commends the Postal Service for these improvements and encourages it to continue to pursue ways of improving the comprehensiveness and usefulness of its service performance measurements.

Respectfully submitted,

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<sup>3</sup> *Brief of the National Postal Policy Council*, Docket No. N2021-1, at 14-17 (June 21, 2021); *Comments of the National Postal Policy Council*, Docket No. PI-2021-3, at 1-3 (Sept. 17, 2021); *Comments of the National Postal Policy Council*, Docket No. ACR2021, at 18-19 (Jan. 31, 2022)